

EXHIBIT

100

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLAUDETTE deLEON,)
Plaintiff,)

vs.) (CIV.-DKT. 05-126-Erie

CRAWFORD CENTRAL SCHOOL)
DISTRICT, CRAWFORD CENTRAL)
SCHOOL BOARD,)
MICHAEL E. DOLECKI,)
SUPERINTENDENT)
(Suable and Liable in)
Personal Capacity))
CHARLES E. HELLER, III,)
ASSISTANT SUPERINTENDENT,)
(Suable and Liable in)
Personal Capacity))
Defendants)

Deposition of JOHN STANFORD, taken on
Tuesday, March 7, 2006, at Crawford Central School
District, Meadville, Pennsylvania commencing at 3:50
a.m., before Linda K. Rogers, Shorthand Reporter and
Commissioner of Deeds in the Commonwealth of
Pennsylvania.

* * *

A P P E A R A N C E S

For the Plaintiff:

Caleb L. Nichols, Esquire
P.O. Box 1585
Erie, Pennsylvania 16507

For the Defendant:

Roberta Binder Heath, Esquire
Andrews & Beard
3366 Lynwood Drive
Altoona, Pennsylvania 16603-1311

* * *

1 J O H N S T A N F O R D, first having
2 been duly sworn, testified as follows:

3
4 D I R E C T E X A M I N A T I O N

5 BY MR. NICHOLS:

6
7 Q. Mr. Stanford, thank you for coming. I am Caleb
8 Nichols. I represent Miss deLeon in this proceeding. Just
9 preliminary instructions. One, we'll ask that you verbalize
10 your responses so that the record will reflect that.
11 Second, if you want us to go off the record at any time,
12 just let me know.

13 A. Okay.

14 Q. We will oblige you. Third, if you don't
15 understand a question, feel free to ask the person who is
16 asking you to rephrase it.

17 A. Okay.

18 Q. Okay. I just -- very briefly here, if you would
19 state for the record your professional background.

20 A. Okay. I taught school for 36, 37 years, I guess
21 it was. I taught here, in Los Angeles, Pittsburgh,
22 Cleveland, Cambridge and then the rest of the time was in
23 Meadville.

24 Q. How long had you been with the school -- Crawford
25 Central School District?

1 A. Crawford Central was 33 years.

2 Q. As a teacher?

3 A. Started 1970.

4 Q. As a teacher?

5 A. As a teacher. And I coached wrestling too.

6 Q. You know Miss deLeon?

7 A. Yes, I do.

8 Q. And you have known her as a colleague since when?

9 A. Let me think on that. I think the first time I
10 met Claudette is when she came from Meadville High School
11 from Cochrannton. And that was in, let's see, it's when we
12 had Juan Pueblo (phonetic), foreign exchange student. And
13 that would go back to -- I can't remember the exact time,
14 '93, '94, sometime around there.

15 Q. Okay. And you taught at the same school.

16 A. Yes, I taught at the high school.

17 Q. Did you have occasion to socialize with her?

18 A. Yes, I did.

19 Q. And we are talking about 1991, you say, up to
20 2000?

21 A. Yeah, it's when we had -- I am trying to think.
22 It's when we had the foreign exchange student, Juan Pueblo.
23 And I think it was shortly right before or after that
24 Claudette came up from Cochrannton.

25 Q. Now, you're an experienced educator based on that

1 many years in academia. What do you consider the qualities
2 of a good teacher?

3 A. Well, a teacher that can handle the classroom.
4 Handle the kids discipline wise and get the subject matter
5 across to as best they can. A classroom is not going to --
6 there's always going to be one or two kids you might have to
7 have a little bit of a problem with, you have to discipline,
8 you have to treat a little bit different.

9 You may have to change the way you're approaching
10 those particular kids more than the other kids in class.
11 It's not a -- there's many variables. It's not a position
12 where you're in a classroom where you treat all the kids
13 exactly the same. There are variables. And in a system
14 where you have kids of different intellectual levels, and
15 you have kids at different social levels, why, you're going
16 to.

17 Q. But if you were to evaluate any teacher in terms
18 of the quality of the teacher, what five attributes would
19 you look to at making such an evaluation?

20 A. Appearance.

21 MS. HEATH: You're just asking him as, what, a
22 layperson or?

23 MR. NICHOLS: Attributes of a good teacher.

24 MS. HEATH: I know, but you're asking his opinion,
25 right?

1 MR. NICHOLS: Right.

2 MS. HEATH: As a layperson, not as an expert.

3 MR. NICHOLS: As one who has taught for 37 years.

4 MS. HEATH: Okay.

5 Q. You know, you say you taught 37 years.

6 A. I would look to see appearance. How their rapport
7 with the students. How they could get their subject matter
8 across. How they prepared their lessons. How their
9 discipline was. How their classroom management was. Those
10 would be the things I suppose I would look for. But I'm not
11 an administrator.

12 Q. I understand. Now, you know Miss deLeon you say
13 as a colleague over a period of time?

14 A. Uh-huh. Yes, I knew her over a period of time.

15 Q. What is your judgment of her as a teacher?

16 A. I was never in her classroom, but as a fellow
17 teacher and knowing her, I think she would try to do a good
18 effort, do a good job. I think she would certainly try to
19 do the background, the paperwork and prepare that way for
20 her classes. I was not in the classroom to know how the
21 discipline was. But I assume the discipline was all right.

22 Q. You consider her a good teacher based upon your
23 knowledge?

24 A. I would say in my opinion, yes, she --

25 MS. HEATH: Objection. He never observed her

1 teaching, he said. Go ahead. I'm sorry.

2 Q. You may go ahead.

3 A. Well, I'd just say yes, my opinion from what I
4 knew, but I wasn't in a classroom personally, that she was a
5 good teacher.

6 Q. I see. Now, were you aware that Miss deLeon had
7 had problems with administration or was that not made --
8 were you aware of that?

9 A. I was only ever personally involved in one
10 situation and that was it. Other than that, I was not
11 personally involved in any situation.

12 Q. Okay.

13 A. I wasn't involved in any meetings at school or
14 anything like that. I was really involved in three
15 situations with Miss deLeon.

16 Q. Okay. Could you describe those as precisely as
17 possible?

18 A. I accompanied her one time as emotional support
19 when she went to a labor attorney in Erie. I accompanied
20 her one time when she needed somebody to go with her,
21 emotional support, to -- was it the Human Relations
22 Commission in Pittsburgh?

23 Q. Yeah.

24 A. I think it was, yeah, yeah. I -- the only other
25 time I was involved in anything was I came to the office one

1 morning and she was crying coming out of the office. And I
2 went up and I said, Claudette, what's the matter. And she
3 said well, I was reprimanded. And about that time
4 Mr. Deshner came out the door and in a stern voice all he
5 said was that, Claudette, you should not talk to another
6 faculty member about what we were talking about in the
7 office. Now, those are the only three times that I was
8 involved with anything.

9 Q. The latter incident

10 A. Huh?

11 Q. The latter incident you just expressed.

12 A. Yes.

13 Q. Was that --

14 A. I mean, after I said what's the matter and
15 Mr. Deshner talked I went on to my classroom.

16 Q. Was that in the hallway?

17 A. It was at the office door going into the office.

18 Q. Was that in the presence of students and other
19 faculty?

20 A. Well, you're asking about something that happened
21 several years ago. There might have been another teacher
22 coming in the door and there might have been one or two
23 students there walking to go class.

24 Q. But it was not in a private office, it was in a
25 public -- it was in a public way, right? It was not behind

1 closed doors?

2 A. Well, it was right there by the office door. And
3 that was the only time I was ever involved.

4 Q. And you say on that occasion Mr. Deshner
5 approached her, right?

6 A. Well, he came out the door, she was talking to me.

7 Q. And he interrupted you?

8 A. Not really interrupted. We were done. She just
9 asked -- I asked her what the problem was and she said she
10 had been reprimanded. I was on my way -- I was going to go
11 back to my classroom.

12 Q. And then he appeared, right?

13 A. Well, he appeared as I was getting ready to
14 walk -- it's like I said okay, what's the problem and she
15 said, I was reprimanded and I walked back to my classroom.
16 He was right there coming out the door.

17 Q. But I want to focus on this incident right now. I
18 mean what occurred, transpired. You were there, Miss deLeon
19 and Mr. Deshner came up, right?

20 A. Well, he was just walking out the door to see what
21 was going on.

22 Q. Yeah, yeah. But then he said -- you were there in
23 the public, this is not behind closed doors it's in a public
24 space, right? He said -- then he admonished Miss deLeon,
25 right?

1 A. Well, he didn't scream or yell. He just talked in
2 a stern voice.

3 Q. Well, I'm talking about the inflection of his
4 voice.

5 A. Well, inflection would be stern.

6 Q. It was not -- it was stern, you say?

7 A. Stern but not --

8 Q. Some people would call it loud and belligerent?

9 A. Well, it wasn't loud --

10 MS. HEATH: Objection.

11 A. -- that you could hear it clear down the hall and
12 it wasn't belligerent.

13 Q. I see.

14 A. No, it was just stern. It's the same way I would
15 say if I would say to a student, did you get your homework
16 done. It was stern. I wouldn't call it belligerent.

17 Q. Uh-huh.

18 A. And I wasn't there that long. I walked back to my
19 classroom. So if anything went on after that, I wasn't
20 there and I didn't hear it because I was on my way back to
21 my room.

22 Q. Uh-huh. And you say Miss deLeon tells you she had
23 been reprimanded, right?

24 A. Yes.

25 Q. Now, was that followed up on some such an occasion

1 she explained to you why she had been reprimanded, why she
2 was crying?

3 A. The only time that she ever -- the only time she
4 really explained to me anything that happened was when she
5 was dismissed, about a letter that she got that she was
6 dismissed as a kind of a threat to -- and that was it. It
7 was rumored but I don't know. You know what I mean? What
8 she explained to me.

9 Q. When she was suspended or?

10 A. No, I can't remember when that was -- when she was
11 let go.

12 Q. Oh, terminated. And then she -- you and she
13 talked?

14 A. Not really. All we -- she just explained that and
15 I said really. I said, I don't see how you can be a threat
16 and that was it. That was the end of it.

17 Q. Okay.

18 MR. NICHOLS: All right.

19 MS. HEATH: I have no questions for you. Thank
20 you.

21 THE WITNESS: That -- I mean, that was the only
22 thing I was ever involved in.


23 MR. NICHOLS: Right. All right. Thank you.

24 (Examination concluded at 4:00 p.m.)

25 * * *

C E R T I F I C A T I O N

I, Linda K. Rogers, Shorthand Reporter and
Commissioner of Deeds in and for the Commonwealth of
Pennsylvania, do hereby certify that I recorded
stenographically the proceedings herein at the time and
place noted in the heading hereof, and that the foregoing is
an accurate and complete transcript of same to the best of
my knowledge and belief.



Linda K. Rogers

Linda K. Rogers
Commonwealth Of Pennsylvania
Commissioner Of Deeds
My Commission Expires 11/1/06

Dated: March 14, 2006

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